
October 16, 2020

Honorable Stuart M. Bernstein
United States Bankruptcy Judge
Southern District of New York
One Bowling Green
New York, New York 10004

*Ien on behalf of herself and all others similarly situated v.
Transcare Corporation, et al.*
Adv. Pro. No. 16-01033 (SMB)

Dear Judge Bernstein:

Pursuant to the Court's Scheduling Order dated August 31, 2020, as modified on September 23, 2020, Plaintiffs circulated a draft pre-trial order with their inserts, and the non-debtor Defendants and the debtor-Defendants returned the pre-trial order with their inserts to Plaintiffs. The pre-trial order is currently due October 20, 2020, and a pre-trial hearing is scheduled for October 27, 2020.

Subject to Court approval, the Plaintiffs and the Chapter 7 Trustee, on behalf of the debtor-Defendants, have reached an agreement that, if approved, will affect the issues to be tried in this adversary proceeding and the pre-trial order. The Plaintiffs and the Chapter 7 Trustee are reducing their agreement to writing, following which the Chapter 7 Trustee will file an appropriate motion seeking Court approval pursuant to Rule 9019 of the Federal Rules of Bankruptcy Procedure.

In light of the foregoing, we write to request an extension of the deadline for the parties to submit the pre-trial order to a date that is 21 days from entry of an Order of the Court respecting the Chapter 7 Trustee's anticipated 9019 motion. We also request that the pre-trial hearing be adjourned or, alternatively, be a status conference. Plaintiffs join in the requests.

We have conferred with counsel to the non-debtor Defendants and they do not object to the requests.

Thank you for your consideration.

Respectfully submitted,

s/ Holly R. Holecek
Holly R. Holecek

cc: René S. Roupinian, Esq.
Nicole A. Eichberger, Esq.
Kathleen McKenna, Esq.
Salvatore LaMonica, as Trustee